

AO 91 (Rev. 1/17) Criminal Complaint

AUSA Jared Jodrey (312) 353-5358

FILED**TD****3/7/2025****THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT****UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA

v.

MARQUEZ ROBINSON,
also known as "Smoke" and "Lil Smoke"CASE NUMBER: 1:25-cr-00128
UNDER SEAL**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about January 31, 2025, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

*Code Section*Title 18, United States Code, Section
922(g)(1)*Offense Description*

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, ammunition, which ammunition had traveled in interstate commerce prior to defendant's possession of the ammunition.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.



MEGAN C. JOHNSON

Special Agent, Federal Bureau of Investigation

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: March 7, 2025*Judge's signature*City and state: Chicago, IllinoisHEATHER K. MCSHAIN, U.S. Magistrate Judge*Printed name and title*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, MEGAN C. JOHNSON, being duly sworn, state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation and have been since December 2021. I am currently assigned to the FBI's Chicago Violent Gang and Racketeering Task Force. As part of my duties, I investigate violations of federal laws including, among other things, criminal enterprises formed by street gangs, violent crimes, and the unlawful possession and use of firearms and ammunition.

2. This affidavit is submitted in support of a criminal complaint alleging that MARQUEZ ROBINSON, also known as "Smoke" and "Lil Smoke," has violated Title 18, United States Code, Section 922(g)(1). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging ROBINSON with being a felon in possession of ammunition, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. The information contained in this affidavit is based on my personal knowledge, my review of reports and evidence, and discussion with other law enforcement officers involved in this investigation.

II. FACTS SUPPORTING PROBABLE CAUSE

A. Summary

4. In summary, and as set forth in more detail below, on January 31, 2025, MARQUEZ ROBINSON and two other individuals shot and killed Victim A while Victim A was standing on the sidewalk near 8523 South Morgan Street, Chicago, Illinois. Chicago Police Department officers recovered cartridge casings at the scene, none of which were manufactured in the state of Illinois.

5. Based on my training and experience, I know that Title 18, United States Code, Section 922(g)(1) prohibits persons previously convicted of crimes punishable by more than one year in prison from possessing firearms or ammunition. I also know that “ammunition” is defined in Title 18, United States Code, Section 921(a)(17)(A) as meaning “ammunition, cartridge cases, primers, bullets, or propellant powder designed for use in any firearm.”

6. As a person previously convicted of a felony offense, namely, violation of 18 U.S.C. § 841 (distribution of narcotics), ROBINSON is prohibited from the possession of ammunition, which, as described below, includes cartridge casings.

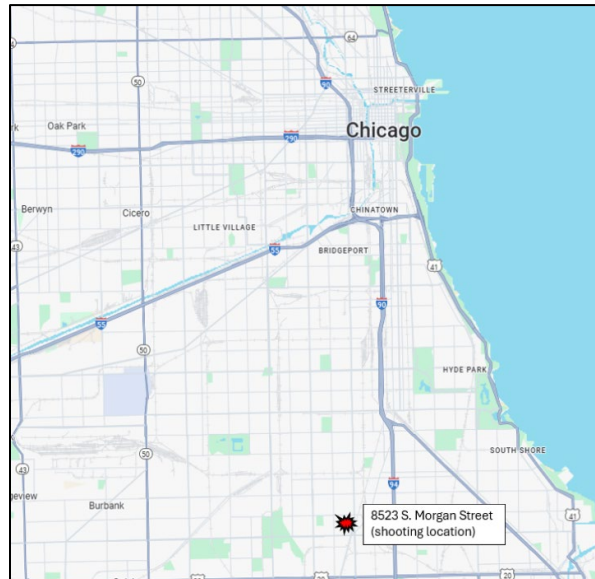
B. Robinson is a Convicted Felon

7. On December 15, 2023, according to court records, ROBINSON pleaded guilty in the Northern District of Illinois to possession of a controlled substance with intent to distribute, in violation of 21 U.S.C. § 841(a)(1), a felony, and was sentenced to 6 months in prison followed by 36 months of supervised release. *See United States v. Marquez Robinson*, Case Number 21 CR 676, Dkt. 76. According to Bureau of

Prisons records, ROBINSON was released from federal custody on or about March 4, 2024. ROBINSON is currently on federal supervised release.

C. January 31, 2025 Murder of Victim A

8. On or about January 31, 2025, at approximately 1:43 p.m., officers from the Chicago Police Department responded to a report of a fatal shooting near 8523 South Morgan Street in Chicago's Auburn Gresham neighborhood. The approximate location of the shooting is depicted in the map below.



9. According to records and information provided by CPD, upon arriving at the scene, CPD officers found Victim A lying dead on the sidewalk and bleeding from multiple bullet wounds.¹ Law enforcement recovered approximately 52 ammunition cartridge casings from the area around Victim A's body in the calibers of 7.62mm x

¹ According to a law enforcement database, prior to his death on or about January 31, 2025, Victim A lived next door to the address where his body was found.

39, 10mm, and .300 AAC Blackout.² Based on a law enforcement analysis of the cartridge casings recovered from the scene, all of the ammunition used in the shooting was manufactured outside of Illinois.

10. A witness captured the final moments of the shooting on camera. I have reviewed the video recording, which captures the sounds of at least six gunshots and shows at least three armed individuals near Victim A's body, who can be seen lying on the sidewalk. The suspects departed the shooting in a silver Nissan Maxima, bearing Illinois license plate ET89772. According to records and information provided by CPD, this silver Nissan Maxima was reported stolen on or about January 24, 2025.

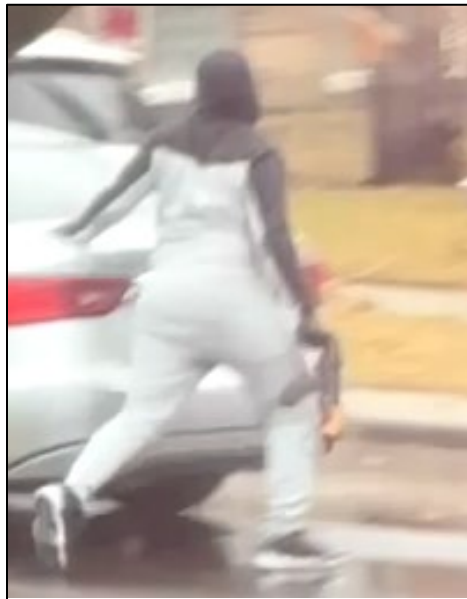
11. Based on my review of the witness's video recording:

a. Suspect 1, later identified as ROBINSON (as described in further detail below), wore a gray hooded sweatshirt, a black face mask, and gray sweatpants with a black stripe down the right leg. After running back to the driver-side door from the front of the car, Suspect 1 appeared to tuck an object consistent with a firearm under his right arm as he entered the driver's seat of the silver Nissan Maxima as the shooting concluded. Cropped still images of Suspect 1, taken from the video, are depicted below.

² According to records and information provided by CPD, on the day of the shooting, CPD recovered approximately 52 bullet casings of all three calibers from the crime scene located on the sidewalk, the street, and on a car parked next to the sidewalk. On or about February 5, 2025, a neighbor reported to law enforcement that he/she had recovered approximately 18 additional bullet casings from the bushes near where Victim A's body was found. A CPD detective subsequently retrieved the additional casings from the neighbor.



b. Suspect 2 wore a hooded sweatshirt with a black hood and sleeves and gray torso, gray sweatpants, and black athletic shoes with white soles. Suspect 2 appeared to be carrying a “Micro Draco”-style semi-automatic firearm, which he pointed and shot twice at Victim A, who was already lying motionless on the sidewalk. After shooting Victim A, Suspect 2 entered the rear driver-side door of the silver Nissan Maxima. A cropped screenshot from the video depicting Suspect 2 is below.



c. Suspect 3 wore a black hooded sweatshirt, black sweatpants, a white mask, and black and gray athletic shoes. A cropped screenshot from the video depicting Suspect 3 carrying the rifle as he entered the rear passenger-side door of the silver Nissan Maxima is depicted below.



12. Based on my review of the witness's video recording, after the three suspects got back into the Silver Nissan Maxima, the vehicle fled from the scene, leaving Victim A's body on the sidewalk.

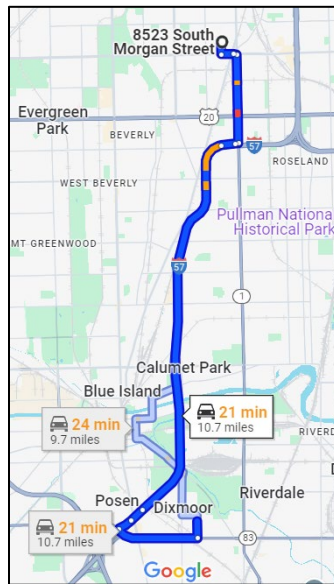
13. At the scene, CPD initially recovered three types of casings: 10mm, 7.62x39mm, and .300 Blackout (which is also known as 7.62x35mm). Notably, only two .300 Blackout casings were recovered. Because that ammunition has the same diameter as 7.62x39mm (the diameter being 7.62, also sometimes known as .30 caliber), and because there are firearms which can shoot both those cartridges, it is possible the same firearm was responsible for both those casing types. From my investigative experience with firearms violations in Chicago, I know it is not

uncommon for ammunition in a magazine to be “mixed,” meaning different brands or different grains are used because of the way subjects who cannot legally purchase their own ammunition procure it from others.

14. At the scene 36 casings of 10mm caliber were recovered. Based on my review of CPD’s crime scene photos, some of these casings were located around the area of Victim A’s feet, and some were located in front of the parked SUV where Suspect 1 and Suspect 3 were standing at the beginning of the witness video (nearer to Victim A’s head as he lay parallel to the parked SUV). From my investigative experience, I know this could mean one shooter with a 10mm firearm was moving around the scene during the shooting, or that two shooters with 10mm firearms were firing from different locations. At this time, firearms lab examination has not been completed to indicate if the 10mm casings were all likely fired from the same firearm or from more than one. That said, based on my training and investigative experience, I also know it is not likely that a participant would be outside of the safety of a vehicle without a firearm during a shooting of this kind.

15. According to law enforcement reports, approximately 30 minutes after the shooting, a vehicle fire was reported in an empty lot located at 14520 South Ashland Avenue in Dixmoor, Illinois. When Dixmoor first responders arrived at the scene, they found the silver Nissan Maxima, which had just been used during Victim A’s homicide, abandoned and burning.

16. According to Google Maps, the location where the burnt silver Nissan Maxima was recovered is approximately 10 miles south of where Victim A was murdered.



Google Maps

D. Robinson and Individual A's Activities on the Morning of Victim's A Murder

17. The FBI reviewed surveillance camera footage of the alley behind the residence located at 11547 South Hale Avenue, Chicago, Illinois (the "South Hale Residence"). Based on my review of that footage, a black Range Rover exited the garage and drove away from the South Hale Residence at approximately 7:15 a.m. on January 31, 2025.

18. The FBI reviewed surveillance camera footage of the alley located behind 6842 South King Drive, Chicago, Illinois (the "South King Residence"). Based on video footage of the South King Residence, multiple interactions that I have had with ROBINSON at the South King Residence, and ROBINSON's presence at the

South King Residence when he was arrested there on February 14, 2025 (discussed below), I believe that ROBINSON resides there. Based on my review of the South King Residence video footage, and its appearance on police observation device (POD) video surveillance and a license plate reader (LPR) while enroute, the black Range Rover that had departed from the South Hale Residence at approximately 7:15 a.m., arrived in the alley behind the South King Residence at approximately 7:38 a.m. on January 31, 2025. After stopping briefly in the driveway, the black Range Rover proceeded to leave the area.

19. At the time of Victim A's murder, state law enforcement authorities were receiving location information for phones used by ROBINSON and Individual A, pursuant to state warrants. According to records and information provided by CPD, ROBINSON had identified the phone number (773-934-4594) as his phone to the federal Probation Office in connection with his pending federal supervised release term. According to location information provided by T-Mobile, pursuant to the state warrant, ROBINSON's phone departed from the South King Residence in a manner consistent with having been picked up by the driver of the Range Rover.

20. Video footage from the alley behind the South Hale Residence showed that ROBINSON and Individual A arrived there in the black Range Rover at approximately 7:53 a.m. on January 31, 2025. ROBINSON got out of the front-passenger seat of the black Range Rover. According to location information for ROBINSON'S phone, at approximately 7:51 a.m., ROBINSON's phone was located in the vicinity of West 123rd Street and Division Street, which is approximately 1.5

miles away from the South Hale Residence. According to location information for Individual A's phone, at approximately 7:58 a.m., Individual A's phone was located in the vicinity of West 122nd Street and Gregory Street, which is approximately 1.2 miles away from the South Hale Residence. As reflected in the cropped screenshot below, the video footage reflects that ROBINSON was wearing a gray hooded sweatshirt, gray sweatpants with a black zipper on the leg, and black athletic shoes.



21. Video footage from the alley behind the South Hale Residence showed that ROBINSON, Individual A, and a minor departed from the South Hale Residence in the black Range Rover at approximately 8:01 a.m.

22. Later that morning, POD video surveillance cameras captured a silver Nissan Maxima, and a black Range Rover, driving around the area of 8600 South Morgan Street—i.e., in the vicinity of Victim A's residence—between approximately 8:29 a.m. and 8:41 a.m. on January 31, 2025.

23. According to court records, Victim A was scheduled to appear in court at the Cook County George N. Leighton Criminal Courthouse at 9:00 a.m. on January 31, 2025. Victim A arrived for court at approximately 10:00 a.m.

24. From approximately 9:38 a.m. to 9:50 a.m. that morning, a silver Nissan Maxima, bearing Illinois license plate ET89772, and a black Chevy Malibu, bearing Illinois license plate ES32470, were captured on license plate readers (LPRs) and POD video surveillance cameras repeatedly circling the block near West 26th Street and South California Avenue, which is where the Cook County Courthouse is located. Location information for ROBINSON's cell phone shows that his phone was in the vicinity of I-55 and South California Avenue, which is approximately just under a mile south of the Cook County Courthouse.

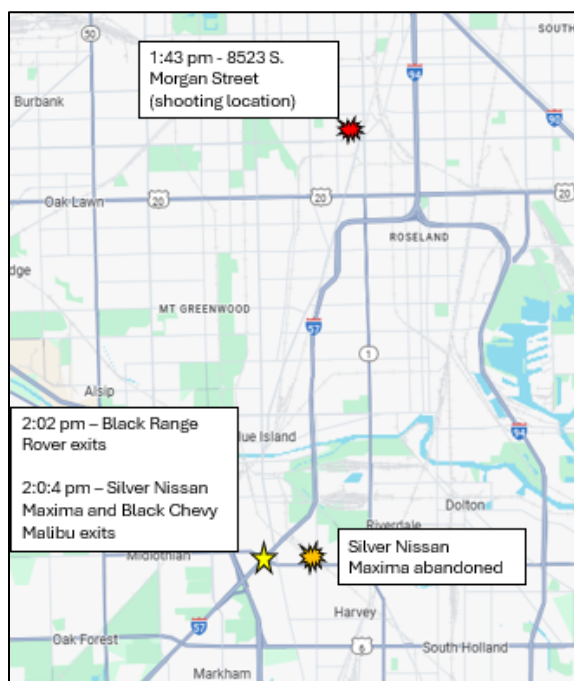
25. POD video surveillance footage shows that a silver Nissan Maxima, a black Chevy Malibu, and a black Range Rover circled the area by the 8600 block of South Morgan Street between approximately 11:17 a.m. to 1:28 p.m. At approximately 1:43 p.m., Victim A was shot to death outside of 8523 South Morgan Street. As discussed above, the shooters fled from the scene in the silver Nissan Maxima.

E. Silver Nissan is Burned and Abandoned in Dixmoor After Victim A's Murder

26. After the shooting, which occurred at approximately 1:43 p.m., POD videos, LPRs, and private security video show the three vehicles—the silver Nissan Maxima, the black Chevy Malibu, and the black Range Rover—traveled together from the scene of the shooting to Dixmoor, Illinois, where the silver Nissan Maxima was

burned and abandoned. For example, according to video footage from a POD camera located by the corner of South Halsted Street and West 87th Street, at approximately 1:44 p.m., the silver Nissan Maxima and the black Chevy Malibu traveled southbound on Halsted. Then, at approximately 2:02 p.m., an LPR captured the black Range Rover exiting Interstate 57 South at West 147th Street. Approximately two minutes later around 2:04 p.m., the LPR captured the silver Nissan Maxima and the black Chevy Malibu at the same exit.

27. Location information for ROBINSON's phone, obtained pursuant to a state warrant, reflects that at approximately 2:11 p.m. on January 31, 2025, ROBINSON's phone was located in the vicinity of South Ashland Avenue and Thornton Road, which is the area near where the silver Nissan Maxima was later found burned and abandoned.



F. Robinson Returns to Chicago from Dixmoor

28. Video footage from the alley behind the South Hale Residence shows that at approximately 2:27 p.m. on January 31, 2025, the black Range Rover returned to the alley behind the South Hale Residence and backed into the garage. About a minute later, at approximately 2:28 p.m., the black Chevrolet Malibu arrived in the alley behind the South Hale Residence. Three individuals got out of the black Chevy Malibu and walked toward the South Hale Residence. One of the men, believed to be ROBINSON, was dressed in a gray hooded sweater, gray pants with a black stripe down the side of the thigh, and black and white shoes. Another one of the men (“Individual B”) was dressed in a half-black and half-gray hooded sweater, gray pants, and black and white shoes.

29. Based on their build and the clothing they were wearing, as captured in above-discussed video recording of Victim A’s homicide, ROBINSON and Individual B appear to be Suspect 1 and Suspect 2, respectively.

30. On or about February 14, 2025, the FBI and CPD located and arrested ROBINSON at his Chicago residence on a federal warrant that had been issued for his arrest in *United States v. Marquez Robinson*, Case Number 21 CR 676. CPD also executed a state search warrant for the residence. During the search of ROBINSON’s residence, law enforcement recovered a gray hooded sweatsuit with a black stripe down the side of the pants legs. These items match those worn by Suspect 1 during Victim A’s murder. Cropped screenshots from the video of the shooting as well as from the alley videos before and after the shooting are set forth below:



Videos depicting Robinson in the alley behind the South Hale Residence before the shooting at around 7:53 a.m. (left) at the scene of the shooting at around 1:43 p.m. (center), and behind the South Hale Residence after the shooting at around 2:28 p.m. (right).

31. In summary, based on the surveillance video footage, LPRs, and cell phone location data, as well as my training and experience in the investigation of violent crimes, there is probable cause to believe that ROBINSON was the driver of the stolen Nissan Maxima used by the shooters in the coordinated murder of Victim A. In the witness video depicting the final moments of the shooting, ROBINSON ran back to the driver's door and appeared to tuck an object consistent with a firearm under his arm as he got into the driver's seat, after which ROBINSON and the two others fled from the scene. From the sounds of gunfire captured on the video, when compared with the position of the suspects in the video at the same time and with the location of shell casings recovered by CPD at the scene, there is probable cause to believe that ROBINSON, a convicted felon, used a firearm during the shooting, and therefore knowingly possessed ammunition in violation of Title 18, United States Code, Section 922(g)(1).

III. CONCLUSION

32. Based on the foregoing, there is probable cause to believe that on or about January 31, 2025, in Chicago, in the Northern District of Illinois, MARQUEZ ROBINSON, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, ammunition, which ammunition had traveled in interstate commerce prior to defendant's possession of the ammunition.

A handwritten signature in cursive script, appearing to read "SA MC Johnson", written over a horizontal line.

MEGAN C. JOHNSON

Special Agent

Federal Bureau of Investigation

SWORN TO AND AFFIRMED by telephone on March 7, 2025.

A handwritten signature in cursive script, appearing to read "Heather K. McShain", written over a horizontal line.

HONORABLE HEATHER K. MCSHAIN

United States Magistrate Judge